



COMMONWEALTH of VIRGINIA

Department of Health
Richmond, Va. 23219

JAMES B. KENLEY, M.D.
COMMISSIONER

APR 10 1985

CERTIFIED - RETURN
RECEIPT REQUESTED

Theodore A. Edwards
Vice President Engineering
Trans/Circuits, Inc.
3509 Carlyn Spring Road
Falls Church, VA 22401

Dear Mr. Edwards:

On March 28, 1985, I visited your facility. The purposes of this visit were to:

1. Inspect the closure of your hazardous waste storage area; and
2. Reinspect your facility as a generator of hazardous waste.

During this visit you indicated that: A. All the drums containing hazardous waste were shipped to proper TSD facilities; and B. The equipment and the storage area were decontaminated and cleaned. During this visit I noticed that your above statements were correct. I inspected your manifests and the storage area. There were not any drums containing hazardous waste on site. Also I noticed the storage area was very clean.

I agreed that closure of your storage area was completed and we should terminate your interim status as a storage facility. I thank you and your staff for a job well done. I also reinspected your facility as a generator. I noticed there is a minor deficiency which is indicated by red marking on the enclosed inspection forms. Please take appropriate action to correct this deficiency.

If you have further questions, please call me at (804) 225-2862.

Sincerely,

A handwritten signature in cursive script that reads "Mohammad R. Habibi".

Mohammad R. Habibi, Chemist
Bureau of Hazardous Waste Management

MRH1:566/lhc

Enclosures

RCRA FACILITY CLOSURE CHECKLIST

Facility Name:

Trans/Tronics Inc.

Facility Address:

3509 Carlyle Spring Road
Dallas Church, Va 22041

Facility I.D. Number:

VHC 04 196 2036

Type of Closure:

Full

X

Partial

Date Closure Plan Received:

501
502
T01

6-4-84

7-26-84

Date of Public Notice:

8/30/84

Date Plan Approved:

Date Inspected:

Date of Certification:

Date Facility Closed:

Facility Status:

Generator

Transporter

TSD Only

Date Entered in HWDMS:

ECA Lead Person

State Lead Person

CLOSURE TRACKING CHART

1/84

Facility Name: TRANS/CIRCUITS, Inc. fall church, VAFacility EPA ID #: VAD 04 196 2036

1. Date of notice of termination of interim status

2. Closure plan requested

Closure plan received

Modification/clarification requested

Modification/clarification received

3. Date of Public Notice

Modification/clarification requested

Modification/clarification received

4. Date of Closure plan approval

5. Owner certification received

6. P.E. certification received

7. Closure inspection(s)

8. Is post-closure required?

If yes, see Section 9.07.07

4/24
July 6, 84
May 30, 84
July 6, 84
July 26, 84

EPA



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JUN 19 1984

Theodore A. Edwards
Vice President - Engineering
Trans Circuits, Inc.
3509 Carlyn Spring Road
Falls Church, Virginia 22041

Dear Mr. Edwards:

On June 29, 1984, I made a follow-up visit of your facility. Most of the deficiencies which were brought to your attention on my previous visit were corrected which include the following areas: (1) Personnel Training; (2) Contingency Plan; (3) Waste Analysis Plan; and (4) Closure Plan. I appreciate the effort of Mr. Bruce Cohen and you for correcting these deficiencies. I would like to make a few suggestions:

1. Please add home addresses of emergency coordinators to Appendix I of the contingency plan.
2. Records of personnel training should be consolidated and updated.
3. Inspection log: Hazardous waste containers and their storage area should be inspected at least once a week and an inspection log should be maintained.

In your letter dated May 30, 1984 and June 13, 1984 you indicated that you would like to be considered a generator of hazardous waste, not a storage facility. In order to close your storage facility and terminate your interim status, your facility will have to be closed in accordance with the procedure specified in Section 9.07 of the Virginia Hazardous Waste Management Regulations. Please submit a modified closure plan or document of demonstration of financial assurances for closure and sudden accidental occurrences by July 30, 1984.

If you have any questions or need assistance, please call me at (804) 225-2862.

Sincerely,

Mohammad R. Habibi

Mohammad R. Habibi, Chemist
Bureau of Hazardous Waste Management

Coded 11/20/84

MRH:554/mcw



Compliance Activities May, 1984

The following information on Compliance Activities is provided in addition to normal inspection reports:

1. Wood Preservers (VAD003113750): As a result of the April 24th meeting, the company sent a compliance schedule received May 9th. In another letter, dated May 29th, the company provided proposals for groundwater monitoring and closure. Copies of both letters are attached.
2. Ashland Chemical (VAD062373600): On May 7th, the Bureau received a letter explaining an apparent acceptance of a shipment from a generator without using the generator I.D. number (copy attached).
3. Browning-Ferris Industries (VAD065394223): On May 29th, Bureau staff, our attorney, and representatives from the company met to discuss several areas of deficiency noted during a follow-up inspection on March 28th. Information showing compliance with Section 9.05.02, operating record, was provided. Other areas including sudden liability will be corrected by June 12th.
4. J. W. Ferguson & Sons (VAD003109360): As a result of an inspection on March 30th, the company was given until May 23rd to comply with generator and storer regulations. On May 22nd the Bureau received the attached letter. On May 24th Bureau staff met with the company's consultant concerning generator requirements and steps necessary to close the facility.
5. Trans Circuits (VAD041962036): Attached is information submitted by the company to correct deficiencies noted during the March 29th inspection.

SLM:388/pc

Attachments